

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:

PAUL S. WHEATON

Debtor

Case No. 1-20-bk-013664-PMM

HEIDI ELIZABETH FIEDLER f/k/a  
HEIDI ELIZABETH WHEATON

Plaintiff

Answer for Motion for 2004  
Examination

v.

PAUL S. WHEATON

Defendant

ANSWER OF PAUL S. WHEATON

COMES NOW, this 11<sup>th</sup> day of June 2021, Paul S. Wheaton, by and through his counsel, CGA Law Firm, Lawrence V. Young, Esquire, and files the within Response for the Motion for a Rule 2004 Examination Averring that:

JURISDICTION

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

PARTIES

5. Admitted.
6. Admitted.

FACTUAL ALLEGATIONS

7. Admitted.
8. Admitted.

9. Admitted.

10. To the extent that the Movant was intimately involved with Mr. Wheaton's businesses, she may have more knowledge and information than he does. It is believed, however, that the schedules filed in the above captioned bankruptcy and the testimony given at the first meeting of creditors pursuant 11 U.S.C. § 341 are an accurate reflection of any existing financial accounts or assets over which Mr. Wheaton has any ownership or control.

**MOTION FOR 2004 EXAMINATION**

11. The responses of Paul Wheaton are incorporated by reference.

12. This is an accurate statement of Rule 2004.

13. This is an accurate statement of the limitations regarding a Rule 2004 Examination.

14. Paul Wheaton is willing to voluntary submit himself to one examination pursuant to Rule 2004. Beyond that, it will be considered harassment, as all of the requested information has been previously provided to the Trustee or other parties.

15. The averments of paragraph 15 require no response.

**ADDITIONAL AVERMENTS**

16. All proceeding pleading are incorporated by reference.

17. A voicemail left with Attorney Filer indicated that the following dates and times are available for both Paul Wheaton and his Counsel, Lawrence V. Young, to submit to a Rule 2004 Deposition in Lancaster.

- June 20, 2021 in the afternoon.
- June 25, 2021 in the afternoon.
- June 28, 2021 in the afternoon.

- June 29, 2021 in the afternoon.
- Jun 30, 2021 in the afternoon.
- July 20, 2021 in the afternoon.
- July 21, 2021 after 2:00pm.
- July 22, 2021 in the afternoon.
- July 23, 2021 in the afternoon.
- July 26, 2021 in the afternoon.
- July, 29, 2021 in the afternoon.
- July 30, 2021 in the afternoon.

WHEREFORE, the Debtor consents to appearing at an agreeable time and date for a Rule 2004 Examination at the Lancaster Bar Association, 28 East Orange Street, Lancaster, PA 17602.

Respectfully submitted,

CGA Law Firm

/s/Lawrence V. Young, Esquire  
Lawrence V. Young, Esquire  
Sup. Ct. I.D. No. 21009  
135 North George Street  
York, PA 17401  
(717) 718-7110  
Counsel for Debtor

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on June 11, 2021, a true and correct copy of the attached Response was served upon the following parties in the following manner:

Name	Mode of Service
Office of the U.S. Trustee	Via CM/ECF
Eric James Filer, Esquire	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Date: 06/11/2021

/s/Lawrence V. Young, Esquire

Lawrence V. Young, Esquire